

**REMARKS**

Reconsideration and allowance of the subject application are respectfully requested. Claims 1-30 and 32 are pending. By this Amendment, claims 1, 3, 12-15, 19, 22, 25 and 28 are amended. By this Amendment, no claims are added or cancelled. Claims 1 and 12-15 are the independent claims.

Because the amendments to claims 1 and 12-15 present new issues requiring a further search and/or consideration, Applicants have filed this Amendment along with a Request for Continued Examination (RCE) to ensure its consideration. Any subsequent action other than a Notice of Allowance or Quayle Action should be **Non-Final**.

**Personal Interview**

Applicants thank the Examiner for granting the personal interview conducted on April 1, 2009. Although no express agreement was reached, Applicants appreciate the Examiner's time and effort in discussing this application and the cited references. In accordance with our discussion, Applicants have amended the independent claims to further clarify the "clip information file" and the "playlist file." Also, as discussed during the interview, Applicants have introduced the "playitem" into the independent claims, and have further clarified the "playitem" in view of the Examiner's comments. Furthermore, Applicants have amended the independent claims to further distinguish the Kaneshige reference from the feature "the clip information file, the playlist file and the stream file being logically separate" as discussed below. In view of these amendments and the following comments, Applicants submit that the pending claims

are in a condition for allowance. As such, Applicants respectfully request a Notice of Allowance to that effect.

### **Claims Rejections - 35 USC §102**

The Examiner has rejected claims 1-3 and 12-19, 22, 25, 28 and 32 under 35 U.S.C. § 102(a) as being anticipated by Kaneshige (U.S. Patent No. 6,360,055, hereinafter “Kaneshige”). Applicants respectfully traverse this rejection for the reasons detailed below.

#### **A. Arguments relating to the Playlist File**

As stated above, Applicants have amended claim 1 to further clarify the “playlist file.” For instance, amended claim 1 recites, *inter alia*, “the playlist file including at least one playitem, each playitem indicating a playing interval from in-point until out-point, the in-point and out-point pointing to time positions on a time axis of the video data.” In contrast to the Examiner’s assertions<sup>1</sup>, Applicants submit that the “Program Chain Information (PGCI)” shown on FIG. 28 of Kaneshige does **not** read on the “playlist file” of claim 1 because the PGCI does not include at least one playitem, where each playitem indicates a playing interval from in-point until out-point, the in-point and out-point pointing to *time* positions on a time axis of the video data. Rather, the PGCI seems to indicate only the ID number of a video object and the order of playback. For instance, the PGCI of Kaneshige includes 5 features, which are illustrated below.

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<sup>1</sup> On page 2 of the Final Office Action, the Examiner asserts that the PGCI corresponds to the playlist file of claim 1.

- 1) Program Chain General Information (PGC\_GI) - indicates the number of programs and number of cells;
- 2) Program Chain Command Table (PGC-PGMP) - indicates pre and post commands;
- 3) Program Chain Program MAP (PGC\_PGMP) - indicates the structure of a program chain and a description of entry cell numbers of an existing program;
- 4) Cell Playback information Table (C\_PBIT) - indicates order of playback;
- 5) Cell Position Information Table (C\_POSIT) - indicates the ID number of a video object.

Applicants submit that none of the features of the PGCI disclose or suggest a “playitem” within the meaning of claim 1.

#### B. Arguments relating to the Clip Information File

As stated above, Applicants have amended claim 1 to further clarify the “clip information file.” For instance, amended claim 1 recites, *inter alia*, each clip information file including a map for the associated stream file, the map mapping a presentation time stamp to a source packet address for an entry point of the associated stream file.” In contrast to the Examiner’s assertions, Applicants submit that the video title set cell address table VTS\_C\_ADT of FIG. 26 of Kaneshige does not read on the “clip information file” of claim 1 because the VTS\_C\_ADT does not include a **map** for the associated stream file. Rather, the VTS\_C\_ADT of Kaneshige is a table that describes **cell address information**. A map is **not** included within the VTS\_C\_ADT because the VTS\_C\_ADT only lists cell addresses which are not mapped to a presentation time stamp for an entry point of the associated stream file. Therefore,

the VTS\_C\_ADT cannot possibly suggest “each clip information file including a map for the associated stream file, the map mapping a presentation time stamp to a source packet address for an entry point of the associated stream file.”

Also, Applicants submit that it is improper for the Examiner to rely on the Cell Playback information Table (C\_PBIT) of Kaneshige as disclosing a “map” within the meaning of claim 1 because the C\_PBIT is part of the **PGCI** (which the Examiner asserts reads on the playlist file). For instance, as stated above, claim 1 requires that the *clip information file* include the map. In contrast, the C\_PBIT is part of the **PGCI** (which the Examiner asserts reads on the playlist file). Therefore, the C\_PBIT and the PGCI cannot be logically separate as required by claim 1. In other words, if the Examiner asserts that the VTS\_C\_ADT corresponds to the clip information file, then the Examiner must find a feature within the VTS\_C\_ADT to correspond to the map. As demonstrated above, the VTS\_C\_ADT does not correspond to the clip information file because the VTS\_C\_ADT does not include a “map” within the meaning of claim 1.

None-the-less, although Applicants believe it is incorrect for the Examiner to rely upon the C\_PBIT of Kaneshige as disclosing the “map” within the meaning of claim 1, Applicants believe that the C\_PBIT does not disclose or suggest “the map mapping a presentation time stamp to a source packet address for an entry point of the associated stream file” as required by claim 1. For instance, as stated above, the C\_PBIT indicates an order of playing back cells. Below are the contents of the C\_PBIT.

- 1) C\_PBTM indicates the cell playback time;
- 2) C\_FVOBU\_SA indicates the starting address of the first video object unit (VOBU) of the cell;
- 3) C\_ILVU\_EA the ending address of the first interleaved unit (ILVU) of the cell;

- 4) C\_FVOBU\_SA the starting address of the last video object unit (VOBU) of the cell; and
- 5) C\_FVOBU\_EA the ending address of the last video object unit (VOBU) of the cell.

The C\_PBIT merely indicates the ending and starting address of interleaved units. Neither the C\_ILVU-EA nor C\_FVOBU\_SA **map** a presentation time stamp to a source packet address for an entry point of the associated stream file. Nothing in Kaneshige appears to disclose these features. Rather, at most, Kaneshige relates to an order of playback cells which indicate a first address and a last address. Therefore, Kaneshige cannot possibly disclose or suggest “the map mapping a presentation time stamp to a source packet address for an entry point of the associated stream file” as required by claim 1.

#### C. Arguments relating to Logically Separate Files

Applicants have amended claim 1 to recite, *inter alia*, “the clip information file, the playlist file and the stream file being logically separate **and including different file extensions**.” As stated during the interview, the VTS\_C\_ADT (allegedly corresponding to the clip information file), the PGCi (allegedly corresponding to the playlist file) and the VTSTT\_VOBS (video object set) (allegedly corresponding to the stream file) are **interleaved and intermixed**, as shown by the top row of FIG. 16 of Kaneshige (e.g., VMG, VTS#1, VTS#2...VTS#n). Therefore, the VTS\_C\_ADT, the PGCi and VTSTT\_VOBS cannot be logically separate. None-the-less, without conceding to the Examiner’s current position, Applicants have amended claim 1 to further recite that the clip information file, the playlist file and the stream file **include different file**

**extensions** The VTS\_CADT, the PGCI and VTSTT\_VOBS do **not** have file extensions. Therefore, Kaneshige cannot possibly disclose or suggest the clip information file, the playlist file and the stream file being logically separate **and including different file extensions.**”

Independent claims 12-15 have been amended to include features similar to the above-recited features of claim 1, and therefore are patentable for at least the same reasons stated above. The dependent claims, dependent on claims 1 and 12-15, are patentable for at least the same reasons stated above. Therefore, Applicants respectfully requests the rejection to claims 1-3 and 12-19, 22, 25, 28 and 32 under 35 U.S.C. § 102(a) be withdrawn.

#### **Claims Rejections - 35 USC §103**

The Examiner has rejected claims 4-11, 20, 21, 23, 24, 26, 27, 29 and 30 under 35 U.S.C. § 103(a) as being unpatentable over Kaneshige in view of Inoshita et al. (U.S. Patent No. 7,024,102, hereinafter “Inoshita”). Applicants respectfully traverse this rejection for the reasons detailed below. Claims 4-11, 20, 21, 23, 24, 26, 27, 29 and 30, dependent on independent claims 1 and 12-15, are patentable for at least the same reasons stated above. For reasons that are apparent, Inoshita does not cure the deficiencies of Kaneshige with respect to the above-recited features of claims 1 and 12-15. Therefore, Inoshita and Kaneshige, alone or in combination, cannot render claims 4-11, 20, 21, 23, 24, 26, 27, 29 and 30 obvious to one of ordinary skill in the art. As a result, Applicants respectfully request the rejection to claims 4-11, 20, 21, 23, 24, 26, 27, 29 and 30 under 35 U.S.C. § 103(a) be withdrawn.

**CONCLUSION**

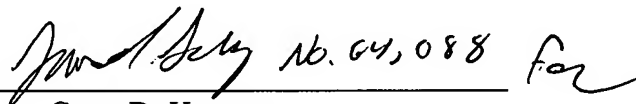
In view of above remarks and amendments, reconsideration of the outstanding rejection and allowance of the pending claims is respectfully requested.

If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at number listed below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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